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VIA ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049 (LJL)

Dear Judge Liman:

On behalf of Blake Lively, we write pursuant to Rule 4.b of Attachment A to Your Honor's Individual Rules to respectfully request that the Court preliminarily seal certain portions of Ms. Lively's Omnibus Brief in support of her Motions to Compel, filed contemporaneously herewith. Ms. Lively also requests that the Court preliminarily seal the following accompanying exhibits to the Declaration of Kristin Bender in support of the Motions to Compel: 2-6, redacted portions of 7, 12-23, and 27-62. All of these materials are (or describe) documents, communications, or other discovery materials that have been designated as Confidential or Attorney's Eyes Only by the Wayfarer Parties or certain third parties.

In accordance with Rule 4.b of Attachment A, Ms. Lively respectfully requests that the Court not rule on this letter-motion to seal for one week, so that the parties have the opportunity to meet and confer, and the parties may file a motion for continued sealing if they so choose.

Respectfully submitted,

/s/ Michael J. Gottlieb

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